

Ladywell's Vitality Spa & Sauna petitions WA State to adopt current National and International acceptable lighting levels for Indoor Spas.

Washington State currently requires indoor Spa lighting levels 2 x's what is the recognized and practiced National and International Standards. This overly bright and outdated lighting issue is a hindrance to our clients' comfort and directly affects our business as we are not able to provide the environment our clients' request, and have come to expect, in this industry. This issue continues because Washington State does not recognize or comply with current King County, National or International Indoor Spa Lighting levels.

Ladywell's Vitality Spa & Sauna demands that Washington state legislature immediately recognize and adopt the current National and International Standards for Indoor Spa Lighting as cited here;

**WA State current WAC code:**

Chapter 246-260 (23) Table 031.7 (Page 16)

\*Indoor pool surface ~ 30 foot candles

**King County current code:**

R14.08.190 Section A Page R14-34

A. 30" above any spa pool walkway – 15 foot candles

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**ANSI – (American National Standards Institute)**

Section 10.17.01.32

**.32 Illumination of Water, Deck, and Walkway.**

An owner shall ensure that an indoor recreational pool, semipublic pool, or public spa, or one used during nighttime, is provided with:

A. Even illumination of the water, deck, and walkways;

B. Illumination of the water and deck that is:

(1) A combination of underwater lighting and deck lighting so that the:

(a) Underwater lighting yields at least 0.5 watt per square foot of water surface area, and

(b) Deck lighting yields at least 0.6 watt per square foot of required deck area or at least 15 footcandles; or

(2) Overhead lighting yielding at least 2 watts per square foot of required deck area or at least 20 footcandles of light that is directed onto the deck and the water surface so that the entire pool or spa bottom is clearly visible;

C. Lighting that minimizes reflection from the water surface so that the visibility of the pool or spa bottom is not obscured; and

D. Walkway lighting yielding at least 15 footcandles of light.

SOURCE REFERENCE \*[www.dsd.md.us/comar/getfile.aspx?file=10.17.32htm](http://www.dsd.md.us/comar/getfile.aspx?file=10.17.32htm)

## **ISPSC- (International Swim Pool & Spa Code) 2012**

### **SECTION 321 LIGHTING**

**321.1 General.** The provisions of this section apply to lighting for all aquatic vessels. **Exception:** Portable residential spas and portable residential exercise spas.

**321.2 Artificial lighting required.** When a pool is open during periods of low natural illumination, artificial lighting shall be provided so that all areas of the pool, including the bottom main drains, will be visible.

**321.2.1 Pool and deck Illumination.** Overhead or underwater lighting shall be provided to illuminate the pool and adjacent deck areas. Such lighting shall be installed in accordance with NFPA 70 or the *International Residential Code*, as applicable in accordance with Section 102.7.1.

**321.2.2 Illumination Intensity.** For outdoor pools, overhead lighting shall provide not less than 3 foot-candles of illumination at the pool water surface and on adjacent deck areas. For indoor pools, overhead lighting shall provide not less than of 10 foot-candles at the pool water surface.

**321.2.3 Underwater lighting.** Underwater lighting shall provide a minimum of 8 lumens per square foot of pool water surface area.

**Exception:** Underwater lighting is not required if overhead lighting provides not less than of 15 foot-candles of illumination at the pool surface.

**321.3 Emergency illumination.** Public pools and pool areas that operate during periods of low illumination shall be provided with sufficient emergency lighting to permit evacuation of the pool and securing of the area in the event of power failure. The emergency lighting intensity shall be not less than 1/2 foot candle.

SOURCE REFERENCE \*[www.waterparks.org/pdfFileUpload/ISPSC=FVI.pdf](http://www.waterparks.org/pdfFileUpload/ISPSC=FVI.pdf)

Signature

Printed Name

Date

**Crystal Carlson, principal, for  
Ladywell's Vitality Spa & Sauna**

1~14~2014